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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

In Re:  
Angela Marie Higgins  
Debtor  
§  
§  
§  
Case No. 09-70642-hdh-13  
Chapter 13

## DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70180-HDH-13 filed on 5/13/2008.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Debtor lost her job and unemployment benefits stopped in March 2009. Debtor could not remain current with her Trustee payments.
5. The following change of circumstances demonstrate that the Debtor can perform this plan and is likely to complete the case successfully: On November 22, 2009, she became employed full time as a sales representative with KAUZ-TV. The Trustee payment will be deducted from her pay check.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,  
/s/Monte J. White  
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on December 22, 2009 on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtor

Bank of America Txu Energy  
Attn: Bankruptcy Dept NC4-105-0 Po Box 666565 Attn Collections  
PO Box 26012 Dallas, TX 75266  
Greensboro, NC 27420

Chase Verizon Wireless  
800 Brookside Blvd 618 Grassmere Park, Ste 14  
Westerville, OH 43081 Nashville, TN 37211

Citibank Wichita Falls Teachers FCU  
Attention: Bankruptcy P.O. Box 4516  
PO Box 20507 Wichita Falls, Texas 76308  
Kansas City, MO 64915

Discover Financial  
Attention: Bankruptcy Department  
PO Box 3025  
New Albany, OH 43054

IRS Special Procedures  
1100 Commerce St., Room 951  
Mail Stop 5029 DAL  
Dallas, TX 75246

Kohls  
Attn: Recovery  
PO Box 3120  
Milwaukee, WI 53201

Monte J. White & Associates  
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Wichita Falls TX 76301

Nelnet Lns  
Attention: Claims  
PO Box 17460  
Denver, CO 80217

Sears  
Attn: Centralized Bankruptcy  
PO Box 20507  
Kansas City, MO 64195

State Farm Bank  
4747 W Irving Park  
Chicago, IL 60641